

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

----- X
:
In re: :
:
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
:
as representative of : Case No. 17-BK-3283 (LTS)
:
THE COMMONWEALTH OF PUERTO RICO *et al.*, : (Jointly Administered)
:
Debtors.¹ :
----- X

----- X
:
In re: :
:
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
:
as representative of : Case No. 17-BK-4780 (LTS)
:
PUERTO RICO ELECTRIC POWER AUTHORITY : **This filing relates only to**
: **Case No. 17-BK-4780 (LTS)**
:
Debtor. :
----- X

**ORDER GRANTING URGENT MOTION TO FILE UNDER SEAL UNREDACTED
OMNIBUS REPLY OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN
SUPPORT OF URGENT (I) OBJECTIONS TO MAGISTRATE JUDGE’S AUGUST 2,
2019 ORDER ON MOTION TO COMPEL AND (II) ALTERNATIVE MOTION TO
STRIKE AND TO EXCLUDE OUT-OF-SCOPE DECLARATION TESTIMONY AND
RELATED EVIDENCE**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon consideration of the *Urgent Motion to File Under Seal Exhibits to Omnibus Reply of Official Committee of Unsecured Creditors in Support of Urgent (I) Objections to Magistrate Judge's August 2, 2019 Order on Motion to Compel and (II) Alternative Motion to Strike and to Exclude Out-Of-Scope Declaration Testimony and Related Evidence* (the "Motion to Seal"),¹ the Court hereby FINDS AND DETERMINES THAT (i) the Court has jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to section 310 of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) due and proper notice of the Motion to Seal has been provided under the particular circumstances and no other or further notice need be provided; (iv) based on the statements and arguments made in the Motion to Seal, the Court finds that it is appropriate for the Committee to file under seal an unredacted version of the *Omnibus Reply of Official Committee of Unsecured Creditors in Support of Urgent (I) Objections to Magistrate Judge's August 2, 2019 Order on Motion to Compel And (II) Alternative Motion to Strike and to Exclude Out-Of-Scope Declaration Testimony and Related Evidence* [Case No. 17-3283, Dkt. No. 8509; Case No. 17-4780, Dkt. No. 1602] (the "Reply"). Accordingly, it is hereby ORDERED THAT:

1. The Committee is entitled to file the full, unredacted version of the Reply under seal.
2. The parties that are entitled to access the full, unredacted version of the Reply are those that have signed the Protective Order and that are entitled to access materials designated "Confidential."
3. The duration of the period of the seal for the full, unredacted version of the Reply is determined by the terms of the Protective Order.

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion to Seal.

4. This order is without prejudice to the rights of any party in interest to seek to unseal the documents or any part thereof.

5. The Clerk of Court will provide access to the sealed materials to the Committee through its counsel of record and the other parties entitled to receive materials designated “Confidential” under the terms of the Protective Order.

Dated: August ____, 2019

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE